

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CYPRESS HOLDINGS, III, L.P., individually and
derivatively on behalf of SPORT-BLX, INC.,

Plaintiff,

-against-

GEORGE HALL, JOSEPH DEPERIO, SPORT-
BLX, INC. and GLASSBRIDGE ENTERPRISES,
INC.,

Defendants.

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Case No. 22-cv-01243 (LGS)

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**DECLARATION OF
JOSEPH DE PERIO IN SUPPORT
OF DEFENDANTS' MOTION TO
DISQUALIFY**
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X

I, Joseph De Perio, declare and state as follows:

1. I am a Director at GlassBridge Enterprises, Inc. ("GlassBridge"). I am also an individual defendant in this action. I offer this reply declaration in further support of my (along with George Hall's, and Sport-BLX Inc.'s) motion to disqualify Fox Rothschild.

2. In response to what Plaintiff asserts in their opposition, I want to make clear that GlassBridge had already invested a significant amount of money in Sport-BLX in January 2019 — that is, when Fox Rothschild was talking to the PBGC, the collateral we directed them to offer was not a "pending" investment, but one we had already made.

3. Attached hereto as **Exhibit 1** is a true copy of the purchase contract for that January 2019 investment.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of June 2022.



JOSEPH DE PERIO